

FILED 13 MAY 19 1456 USDC-ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

**William X Nietzsche (solely as trustee for
KRME International Trust),**

Et al.,

3:18-CV-01930-SI

Plaintiff/Petitioner,

Case No.

**PLAINTIFF'S MOTION TO CURE
ANY DEFECTS IN SERVICE OF
PROCESS**

v.

FREEDOM MORTGAGE CORPORATION (FMC),

Et al.,

Defendant(s)/Respondent(s)

PLAINTIFF'S MOTION TO CURE ANY DEFECTS IN SERVICE OF PROCESS

Plaintiff William and Julie Kinney ("The Kinney's"), by and through Plaintiff/trustee William X Nietzsche, hereby moves this Court of Record to enter an order allowing Plaintiff's to cure any defects in service of process, stating in support:

LR 7-1(a) CERTIFICATION

1. Plaintiffs certifies that before filing this motion, Plaintiffs conferred in good faith with Counsel for defendants HSBC Holdings PLC, HSBC Finance Corporation, HSBC Home Equity Loan (collectively "HSBC") and Beneficial Oregon, Inc, Beneficial Financial 1 Inc., (collectively "Beneficial").
2. Counsel for Defendants HSBC and Beneficial do not oppose this motion.

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MOTION

3. Plaintiffs respectfully move this Court of Record for an order allowing Plaintiffs to cure any defects in service of process on either of the Defendants named in this matter.
4. Plaintiffs make this request pursuant to FRCP 4(m).
5. Several Defendants named in this matter are Goliath Corporations with complex corporate structures with numerous subsidiaries that are alleged to be involved in this matter.
6. Plaintiffs need to ensure that proper service has been made upon Defendants to allow the that orderly administration of justice of this Court of Record is adhered.
7. Defendants do not oppose this motion, which is made for good cause and not for purposes of delay.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter an order:

1. Allowing Plaintiffs to cure any defects in service of process.

RESPECTFULLY DATED this 13 day of May, 2019.

By Julie Ann Metcalf Kinney
Julie Ann Metcalf Kinney
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]

By William X Nietzsche
William X Nietzsche, as trustee for KRME International Trust
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]